

GODFREY | JOHNSON, P.C.
9557 S. KINGSTON COURT
ENGLEWOOD, CO 80112

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DONALD R. MEALING, LYNN R. HASNEY
and INC. FUNDAMENTALS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ELENA DEL CAMPO, *et al.* on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

AMERICAN CORRECTIVE COUNSELING
SERVICES, INC., *et al.*,

Defendants.

Case No. C01-21151 SI

**DEFENDANTS' UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO FILE REPLY BRIEFS**

Hearing: February 28, 2014
Time: 9:00 a.m.
Courtroom: 10

Defendants Don Mealing, Lynn Hasney and Inc. Fundamentals, by and through
counsel, Godfrey Johnson, P.C., hereby submit their Unopposed Motion for Extension of
Time to File Reply Briefs, showing the Court as follows:

1. Undersigned counsel certifies that she has conferred with counsel for Plaintiffs
who takes no position on the relief requested herein.

2. Pursuant to the Civil Pretrial Minutes issued by the Court on December 19, 2013
(Doc. No. 1345), dispositive motions and Defendants' motion to decertify were due on

1 January 24, 2014, responses were due on February 7, 2014, and replies are due on February
2 14, 2014.

3 3. Because of the Court's ECF technical failure on January, 24, 2014, Defendants
4 filed their motions on the next court date following the ECF technical failure on January 27,
5 2014 pursuant to the local rules.

6
7 4. While there was not a second technical failure, Plaintiffs filed their responses to
8 Defendants' motions on February 10, 2014.

9 5. Defendants therefore respectfully request that their time to reply to Plaintiffs'
10 responses be extended for the same period of time taken by Plaintiffs, making their replies on
11 their motion for summary judgment and motion to decertify due on February 18, 2014.

12
13 6. In the alternative, Defendants would request that Plaintiffs' responses be stricken
14 as untimely as their late filing would greatly prejudice Defendants, especially in light of the
15 expedited briefing schedule, complexity of the briefed issues, and the volume of exhibits
16 attached to Plaintiffs' responses.

17
18 WHEREFORE, Defendants respectfully request a brief extension of time to file their
19 reply briefs, up to and including February 18, 2014.

20 Dated this 12th day of February, 2014.

21
22
23 /s/ Julie N. Richards

Julie N. Richards

Attorneys for Defendants

Donald R. Mealing, Lynn R. Hasney, and
Inc. Fundamentals

IT IS SO ORDERED

24
25
26
27 EDWARD M. CHEN
Susan Hinton, Judge UNITED STATES DISTRICT JUDGE

28
2/18/2014
Date